

June 20, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: **Notice of Ex Parte – Misuse of Internet Protocol (IP) Captioned Telephone Service, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 13-24 & 03-123**

Dear Ms. Dortch:

On June 16, 2017, Michael Strecker, Vice President of Regulatory Affairs, ClearCaptions LLC, met with Zenji Nakazawa, Acting Public Safety and Consumer Protection Advisor to Chairman Ajit Pai, regarding Internet Protocol Captioned Telephone Service (“IP CTS”) matters in the above referenced proceedings.

After a brief introduction regarding status of the Company, ClearCaptions discussions in this meeting focused on its recent comments filed in response to the Commission’s Public Notice, dated May 10, 2017.¹

Additionally, ClearCaptions expressed its belief that it is essential that, when ASR technology is ready for deployment, any transition must be seamless to the consumer while not producing any degradation of service. The Company stressed that in examining any potential readjustment in the IP CTS per-minute rates mechanism the Commission must consider the inevitable impact on continued investment in ASR development. ClearCaptions conceded that research and development expenditures are not per se included under current categories of IPCTS costs. However, the reality is that capital is necessary to make progress toward an ASR solution and near-term rate reductions would challenge ClearCaptions’ ability to continue its efforts at a critical time. ClearCaptions did support the concept of a separate ASR rate that would incent

¹ *Rolka Loube Associates Submits Payment Formulas And Funding Requirement For The Interstate Telecommunications Relay Services Fund For The 2017-18 Fund Year*, CG Docket Nos. 03-123 & 10-51, Public Notice, DA 17-445 (May 10, 2017) (“TRS Fund Administrator Estimate PN”); *see also* Rolka Loube Associates LLC (“Rolka Loube”), *Interstate Telecommunications Relay Services Fund Payment Formula and Fund Size Estimate*, CG Docket Nos. 03-123 & 10-51 (May 2, 2017) (“TRS Fund Administrator Estimate”); *see also* Comments of ClearCaptions, LLC On Rolka Loube Associates Payment Formula And Fund Size Estimate, CG Dockets 03-123 and 10-51, May 24, 2017

providers to move minutes to ASR should such movement be the Commission's goal.² The Company believed such a financial incentive would motivate providers to invest in ASR technology and create a reward mechanism for doing so.

ClearCaptions expressed its concerns in regards to VTC Secure's recent application to become a certified IP CTS provider.³ More specifically, there were two key items that were discussed: (1) VTC Secure's statement that ASR results in 99% accuracy and (2) VTC Secure recommended a reimbursement rate of approximately \$.29 per minute for calls that are processed via an ASR engine. In regards to (1), ClearCaptions wanted to point out that VTC Secure acknowledges that the 99% accuracy can only be achieved in "perfect conditions". The reality is that today, a large majority of these calls are not in perfect conditions and ClearCaptions wanted to express its concerns that making this type of statement grossly overstates the readiness of full scale adoption of ASR and its effectiveness. In regards to (2), ClearCaptions has serious concerns as to how, with no experience operating this type of business in this market, VTC Secure was able to compute a reimbursement rate of \$.29 a minute for an ASR handled call. ClearCaptions recommends the Commission ignore this theoretical rate proposal, and base its final determination on more grounded and fact based inputs.

Respectfully submitted,

/s/ Michael Strecker

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cc: Zenji Nakazawa

² *Ex Parte* Notice from John T. Nakahata, Counsel to CaptionCall, LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CG Docket Nos. 03-123 and 13-24, dated April 24, 2017, p.6 ("CaptionCall *Ex Parte*").

³ See VTCSecure LLC's *Internet-Based TRS Certification Application*, CG Docket Nos. 03-123 (May 26, 2017)